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U.S. DISTRICT COURT
DISTRICT OF MASS.
CASE NO. 19-10001

**DEFENDANT ASTRAZENECA PHARMACEUTICALS L.P.'S ASSENTED-TO
MOTION FOR LEAVE TO FILE A REDACTED VERSION OF THE AMENDED
MASTER CONSOLIDATED CLASS ACTION COMPLAINT**

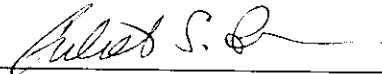
Pursuant to the Protective Order entered by this Court on December 13, 2002 ("Protective Order"), defendant AstraZeneca Pharmaceuticals L.P. respectfully moves this Court for leave to file the accompanying redacted version of the Amended Master Consolidated Class Action Complaint ("AMCC") for placement on PACER instead of the unredacted version currently on file with the Court, pending the Court's decision on a motion to be filed by defendants no later than August 1, 2003 to have the AMCC filed under seal. Plaintiffs have no objection to this motion, but preserve their right to challenge defendants' designation of material as "confidential" or "highly confidential" pursuant to the Protective Order.

On June 12, 2003, plaintiffs filed a motion for leave to file an amended complaint, together with a proposed AMCC. The proposed AMCC included information that had been identified by defendants as “confidential” and “highly confidential” pursuant to the terms of the Protective Order, because it included, *inter alia*, proprietary and commercially sensitive information relating to the pricing and marketing of pharmaceuticals. Accordingly, pursuant to

Paragraph 15 of the Protective Order, plaintiffs filed the proposed AMCC under seal. On June 18, 2003, this Court granted plaintiffs' motion to file the AMCC.

Defendants understand that the AMCC will be publicly available unless Defendants move to have it filed under seal. Defendants intend to file such a motion no later than August 1, 2003. In the interim, defendants respectfully move the Court to replace the unredacted version of the AMCC currently available on PACER with the accompanying redacted version of the AMCC, until such time as the Court determines defendants' forthcoming motion to file the AMCC under seal.

Respectfully submitted,

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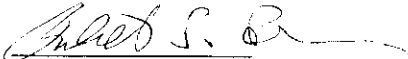
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Dated: July 25, 2003

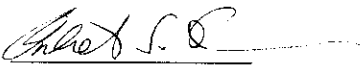
CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on July 25, 2002, a copy to Verilaw Technologies for posting and notification to all parties.


Juliet S. Sorensen

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendants conferred with counsel for plaintiff on this motion, and that counsel for plaintiff assented to the motion.


Juliet S. Sorensen

FILED
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